

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

BRENDA SWEETLAND, on behalf of)	
herself and all others similarly situated,)	
)	
Plaintiff)	
)	
vs.)	
)	Case No. 1:21-cv-10759-LTS
WHEELABRATOR SAUGUS, INC.,)	
)	
Defendant)	
)	

**PLAINTIFF’S MOTION TO REOPEN DISCOVERY AND AMEND THE SCHEDULING
ORDER OR, IN THE ALTERNATIVE, STRIKE DEFENDANT’S DECLARATIONS**

NOW COMES Plaintiff Brenda Sweetland (“Plaintiff”), on behalf of herself and all others similarly situated, by and through her attorneys, and move to reopen discovery for the sole and limited purpose of determining the method of procurement and veracity of the Declarations (“Declarations”) that defense counsel produced first on the eve of the close of discovery and then again well after the close of discovery after admitting that some or all of the first set of declarations were illegally forged and obtained. Counsel for Wheelabrator Saugus, Inc. (“Defendant”) provided Plaintiff with troubling information regarding the reliability and validity of some of the Declarations, and the alarming nature of this information casts doubt on the validity of all the Declarations. As explained below, because at least 19 Declarations were “corrected” to remedy allegedly forged signatures, all the Declarations should be subject to scrutiny regarding their veracity. The following events have led to Plaintiff proffering this motion to request to reopen discovery solely as it relates to the Defendant’s Declarations:

1. Beginning on July 13 and pursuant to the discovery schedule, Defendant produced

the first batch of Declarations gathered from Saugus residents both within and outside of the proposed Class Area, stating that they “do not ever notice noxious odors” or “unusual or unnatural amounts of dust or ash” on their properties. Additionally, residents declared that they “enjoy numerous activities outside” and that they do not think that “odors, dust, or ash” have in any way affected their property values. [Exhibit 1].

2. Defendant provided Plaintiff with additional Declarations on July 19, 2022 producing a total of 39 Declarations on July 13 and 19.

3. The close of Class Certification discovery was scheduled to occur on July 22, 2022.

4. On July 20, 2022 Plaintiff served Defendant with Notices of Intent to Serve Subpoenas to depose four (4) Declarants on August 15, 2022. Defendant objected to the Subpoenas arguing that they were untimely since the depositions would occur after the close of discovery. [Exhibit 2].

5. At a previously scheduled Status Conference on July 26, 2022 this Court heard the parties’ positions on the issue and ruled that the depositions of the four declarants could move forward on Monday, August 15, 2022

6. On Friday, August 12, 2022, Plaintiff’s Counsel, Laura Sheets, received a telephone call from defense counsel, Richard Oetheimer, indicating that he had just been informed that some or all of the Declarations had been illegally forged. [Exhibit 3]. Mr. Oetheimer could not provide additional details about who had procured the illegally forged declarations, or how many of the declarations had been forged. [Exhibit 3].

7. Mr. Oetheimer also indicated that he did not believe that the four deponents would appear for Monday’s depositions and requested an adjournment. This request was denied as Plaintiff’s Counsel was interested in determining if those who had received the subpoenas had in

fact signed their declaration. [Exhibit 3].

8. On August 15, not one of the subpoenaed individuals appeared for their depositions. [Exhibit 3].

9. At no point since that telephone call on August 12 or since the four declarants failed to appear for their deposition on August 15 has Mr. Oetheimer provided any additional details about this situation including who procured these illegally signed declarations.

10. Instead, on August 31, 2022, well after the period for fact discovery closed on July 22, [Exhibit 4] Defendant made an additional disclosure of 19 Declarations, all of which were duplicates of Declarations previously disclosed on July 13 and 19, but which had apparently been redone, resigned, and otherwise “corrected” with different details to remedy the forgeries allegedly tainting the originals. [Exhibit 5]. These additional corrected Declarations were seemingly Defendant’s attempt to remedy the fraudulent Declarations that Defendant brought to Plaintiff’s attention during the August 12 phone call.

11. After investing significant hours examining Declaration disclosures, Plaintiff discovered that the corrected Declarations produced on August 31 feature stark and shocking differences from the originals produced on July 13 and 19, including completely different handwriting, dates, distances, and signatures. In some instances, even the printed names differ between the original and revised versions. [Exhibit 6]. These differences are such that it is impossible that the same person filled in both the July and August Declarations.

12. Many of the corrected Declarations completely omit or alter the distance that the Declarant lives from Defendant’s Facility, with one example provided in Exhibit 7. Many alternatively or additionally include discrepancies in the duration that the Declarant had lived at their address, with one example provided in Exhibit 8. Finally, all the corrected Declarations

feature inconsistent signatures between the original and corrected documents, with a particularly striking example included as Exhibit 9.

13. Due to the events described above, Plaintiff's Counsel has serious concerns that Defendant has procured and relied on, fraudulent and untrustworthy Declarations that should not be considered until Plaintiff has an opportunity to further conduct discovery concerning the acquisition and accuracy of the Declarations.

14. Should the Court grant this request, Plaintiff seeks to adjourn the remaining dates on the Scheduling Order by 45 days to allow for the additional discovery.

15. In the alternative, in light of the fact that some or all of the Declarations were illegally forged, Plaintiff request that this Court strike them from the record and not permit their use in future filings by the Defendant.

WHEREFORE Plaintiff respectfully requests that this Honorable Court GRANT Plaintiff's motion to reopen discovery on the sole and limited issue of determining the source and veracity of the Declarations, including by conducting depositions and issuing interrogatories. To the extent that this request is granted, Plaintiff requests an extension of the current scheduling order by 45 days to allow for the requested discovery. In the alternative, Plaintiff respectfully requests that this Honorable Court STRIKE all declarations from the record as untrustworthy and lacking foundation.

Dated: October 6, 2022

Respectfully submitted,

s/ Laura L. Sheets

Steven D. Liddle*

Laura L. Sheets*

Matthew Z. Robb*

**Admitted Pro Hac Vice*

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Attorneys for Plaintiff and the putative Class

Exhibit 1

19 Original Declarations

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Doug Clark, and I live at 9 Johnson Street, Saugus,
1/2 approximately Half a mile miles from the Wheelabrator Saugus waste-to-energy facility.
I own rent my home and have lived at this address for about 20 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 6/11/22

Signed: [Signature]

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff.

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Tina Oliver, and I live at 270 Oak St
approximately 1/2 miles from the Wheelabrator Saugus waste-to-energy facility.
I own / rent my home and have lived at this address for about 2 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 7/2/22

Signed: [Signature]

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is STEVE ANDERSON, and I live at 2 MILAN AVE, SAUGUS!
approximately 1.0 miles from the Wheelabrator Saugus waste-to-energy facility.

I own / rent my home and have lived at this address for about 20 years.

2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 6/11/2022

Signed: Steve Anderson

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Stephen Basile, and I live at 18 Serino Way, Saugus, Ma 01906
approximately 1/2 miles from the Wheelabrator Saugus waste-to-energy facility.
I own / rent my home and have lived at this address for about 13 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on:

Stephen Basile

Signed:

7/1

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Charles Gracie, and I live at 7 Warren Road, Saugus, MA, approximately 1/2 miles from the Wheelabrator Saugus waste-to-energy facility. I own / rent my home and have lived at this address for about 6 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 6/11/2022

Signed: [Signature]

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Stephanie Fernandez, and I live at 4 milan Avenue, Saugus, ma 01906
approximately 3/4 miles from the Wheelabrator Saugus waste-to-energy facility.
I own / rent my home and have lived at this address for about 10 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: June 12, 2022

Signed: Stephanie Fernandez

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Sara Coglianò, and I live at 310 Lincoln Ave, Saugus
approximately 1 miles from the Wheelabrator Saugus waste-to-energy facility.

I own / rent my home and have lived at this address for about 83 years.

2. I do not ever notice noxious odors at my home.

3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.

4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.

5. I do not think odors, dust or ash have affected my property value.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 6/11/22

Signed: Sara Coglianò

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Robert Catinazzo and I live at 151 Fairmont Ave,
Saugus, MA 01906,
approximately 1 miles from the Wheelabrator Saugus waste-to-energy facility.
I own / rent my home and have lived at this address for about 14 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 6-12-22

Signed: Robert Catinazzo

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is John Copper and I live at 44 BRISTOW STREET
SAUGUS
approximately 1/2 miles from the Wheelabrator Saugus waste-to-energy facility.

I own / rent my home and have lived at this address for about 18 years.

2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: June 19, 2022

Signed: [Signature]

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Lou Spadefora, and I live at 23 Morse St.,
approximately 1 1/2 miles from the Wheelabrator Saugus waste-to-energy facility.

I own / rent my home and have lived at this address for about 20 years.

2. I do not ever notice noxious odors at my home.

3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.

4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.

5. I do not think odors, dust or ash have affected my property value.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 7/2/22

Signed: Lou Spadefora

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Little Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Cherie L. Snow, and I live at 38 Schenck St.,
approximately 1 miles from the Wheelabrator Saugus waste-to-energy facility.

I own / rent my home and have lived at this address for about 8 years.

2. I do not ever notice noxious odors at my home.

3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.

4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.

5. I do not think odors, dust or ash have affected my property value.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 7/2/22

Signed: [Signature]

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Jeff Paolini, and I live at 17 Wickford St,
approximately 1.0 miles from the Wheelabrator Saugus waste-to-energy facility. Saugus, MA

I own / rent my home and have lived at this address for about 11 years.

2. I do not ever notice noxious odors at my home.

3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.

4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.

5. I do not think odors, dust or ash have affected my property value.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 6/11/2022

Jeff Paolini

Signed: _____

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Richard Swan and I live at 26 Elm Rd.
approximately 1/2 miles from the Wheelabrator Saugus waste-to-energy facility.

I own rent my home and have lived at this address for about 20 years.

2. I do not ever notice noxious odors at my home.

3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.

4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.

5. I do not think odors, dust or ash have affected my property value.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 7/2/22

Signed: Richard Swan

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Kathy Weishaar and I live at 34 Bristow St,
Saugus
approximately 42 miles from the Wheelabrator Saugus waste-to-energy facility.
I own rent my home and have lived at this address for about 30 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 6/11/22

Signed: Kathy Weishaar

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Richard Nuzzo, and I live at 12 Serina Way,
approximately 1 miles from the Wheelabrator Saugus waste-to-energy facility, Saugus, Ma.
I own / rent my home and have lived at this address for about 11 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on:

Richard Nuzzo

Signed:

June 20 2022

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Anthony Nuzzo, and I live at 17 Segino Way, Saugus, MA
approximately 1 miles from the Wheelabrator Saugus waste-to-energy facility.
I own / rent my home and have lived at this address for about 9 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 2, 2022

Signed: Anthony Nuzzo

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Barbara Mahan, and I live at 27 Carr Road
Saugus, MA 01906
approximately 1/2 miles from the Wheelabrator Saugus waste-to-energy facility.

I own / rent my home and have lived at this address for about 40 years.

2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: June 10, 2022

Signe

27 Carr Road
01906

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is KRISTEN JOHNSON and I live at 4 MILAN AVE
SAUGUS
approximately .5 ^{1/2} miles from the Wheelabrator Saugus waste-to-energy facility.
I own / rent my home and have lived at this address for about 17 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on:

7-1-22

Signed:



I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Elizabeth Marchese and I live at 34 School St Saugus,
approximately 2 miles from the Wheelabrator Saugus waste-to-energy facility.
I own / rent my home and have lived at this address for about 21 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on:

June 15th

Signed:

Elizabeth Marchese

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

Exhibit 2

Email from Defense Counsel Re: Opposition to Declarant Depositions

From: [Laura Sheets](#)
To: [Reed Solt](#)
Subject: FW: Sweetland v Wheelabrator Case No. 21-cv-10759-LTS
Date: Wednesday, October 5, 2022 1:38:49 PM
Attachments: [image001.png](#)

From: Oetheimer, Richard A <ROetheimer@goodwinlaw.com>
Sent: Wednesday, July 20, 2022 5:59 PM
To: Laura Sheets <LSheets@lscounsel.com>; Albert Asciutto <AAsciutto@lscounsel.com>
Cc: Evans, William <WEvans@goodwinlaw.com>; Perez-Sparks, Sierra <SPerezSparks@goodwinlaw.com>
Subject: RE: Sweetland v Wheelabrator Case No. 21-cv-10759-LTS

Counsel,

Defendant's position is that plaintiff's proposed subpoenas for fact witness depositions on August 15, 2022, after the July 22 close of class certification fact discovery, are out of time under the Court's September 2, 2021 Scheduling Order, and you will be in violation of the Court's Order if you serve the subpoenas without first obtaining relief. It can be raised with Judge Sorokin at the July 26 Conference.

Richard A. Oetheimer



Goodwin Procter LLP
100 Northern Avenue
Boston, MA 02210
o +1 617 570 1259
f +1 617 801 8747
ROetheimer@goodwinlaw.com | goodwinlaw.com

From: Bethany Favaro <bfavaro@lscounsel.com>
Sent: Wednesday, July 20, 2022 4:59 PM
To: Oetheimer, Richard A <ROetheimer@goodwinlaw.com>; Evans, William <WEvans@goodwinlaw.com>; Perez-Sparks, Sierra <SPerezSparks@goodwinlaw.com>
Cc: Albert Asciutto <AAsciutto@lscounsel.com>; Laura Sheets <LSheets@lscounsel.com>
Subject: Sweetland v Wheelabrator Case No. 21-cv-10759-LTS

EXTERNAL

Good afternoon,

Attached please find Plaintiff's Notice of Intent to Serve Subpoenas which we mailed today.

Thank you,

Bethany Favaro | Paralegal

Liddle Sheets Coulson P.C.

975 E. Jefferson Avenue, Detroit, MI 48207

Tel: 313 392 0015 | Fax 313 392 0025

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Exhibit 3

Laura L. Sheets Affidavit

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff

v

WHEELABRATOR SAUGUS, INC.,

Defendant

Civil Action No. 21-cv-10759-LTS

DECLARATION OF LAURA L. SHEETS

I, Laura L. Sheets, do hereby declare as follows:

1. I am an attorney and partner at the law firm of Liddle Sheets Coulson P.C. My firm was retained by Plaintiff Brenda Sweetland to represent her, on behalf of herself and all others similarly situated in this matter, against Wheelabrator Inc. (“Defendant”) relating to claims arising from Defendant’s repeated, widespread nuisance odor emissions into neighboring properties in Saugus, Massachusetts.

2. For the purposes of this matter, I have associated with William P. Doyle of Colonna & Doyle to represent Plaintiff and the Class in this matter.

3. I make these statements based on personal knowledge and in support of Plaintiff’s Motion to Reopen Discovery.

4. Prior to the close of discovery, Defendant obtained and disclosed 39 Declarations from Saugus citizens on July 13 and 19 in which the Declarants swear under penalty of perjury that they “do not ever notice noxious odors” or “unusual or unnatural amounts of dust or ash” on

their properties. Residents also declared that they “enjoy numerous activities outside” and that they do not think that “odors, dust, or ash” have in any way affected their property values.

5. On July 20, Plaintiff served Defendant with Notices of Intent to Serve Subpoenas to depose four (4) Declarants on August 15. Defendant objected to the Subpoenas arguing that, because they would not occur until after the close of discovery, the depositions would be untimely.

6. At a previously scheduled Status Conference on July 26th, this Court heard the parties’ positions on the issue and ruled that the depositions of the four declarants could move forward on Monday, August 15th.

7. On August 12, I received a telephone call from defense counsel, Richard Oetheimer, indicating that he had been informed that some or all of the Declarations had been illegally forged and did not contain authentic signatures or information from the purported signer.

8. Mr. Oetheimer stated that he did not know and could not provide additional details about who had procured the illegals forged declarations or how many of the Declarations had been forged.

9. In the same August 12 telephone call, Mr. Oetheimer indicated that he did not believe that the four deponents would appear for their August 15 depositions and requested an adjournment. I denied this request, as I was interested in determining if those who had received the subpoenas had in fact signed the Declarations purporting to bear their signatures. I additionally wished to ascertain through these depositions who had procured the Declarations and other details as well.

10. None of the subpoenaed individuals appeared for their August 15 depositions, and at no point since the August 12th telephone call has Mr. Oetheimer provided any additional details

about the declarations, including who procured them and/or how many featured illegally forged signatures.

11. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5th Day of October 2022 in Detroit, Michigan.

Dated October 5, 2022

/s/ Laura L. Sheets

Laura L. Sheets

Exhibit 4

Email From Defense Counsel Re: August 31 Production

Reed Solt

From: Laura Sheets
Sent: Tuesday, October 4, 2022 1:29 PM
To: Reed Solt
Subject: FW: Sweetland v. Wheelabrator Saugus, Inc.
Attachments: Saugus Resident Declarations.zip

From: Oetheimer, Richard A <ROetheimer@goodwinlaw.com>
Sent: Tuesday, August 30, 2022 4:15 PM
To: Laura Sheets <LSheets@lscounsel.com>; Matt Robb <MRobb@lscounsel.com>
Cc: Breitling, Amy <ABreitling@goodwinlaw.com>
Subject: Sweetland v. Wheelabrator Saugus, Inc.

Laura and Matt,

Attached are 19 Declarations signed by Saugus residents previously identified in WSI's Rule 26 Supplemental Disclosures served on July 12, 2022.

Saugus residents Joseph Dennis Gould, Karlin Moore and Anthony Cogliano and all 17 Revere Declarants signed the Declarations provided on July 12.

Richard A. Oetheimer



Goodwin Procter LLP
100 Northern Avenue
Boston, MA 02210
o +1 617 570 1259
f +1 617 801 8747
ROetheimer@goodwinlaw.com | goodwinlaw.com

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Exhibit 5

19 Corrected Declarations

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Sara Coulson, and I live at 310 Lincoln Ave Saugus
approximately _____ miles from the Wheelabrator Saugus waste-to-energy facility.

I own / rent my home and have lived at this address for about 50 years.

2. I do not ever notice noxious odors at my home.

3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.

4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.

5. I do not think odors, dust or ash have affected my property value.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/22/22

Signed: Sara Coulson

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746, I declare and say:

1. My name is Anthony Vozzo, and I live at 14 Sarno Way
approximately 1/2 miles from the Wheelabrator Saugus waste-to-energy facility.
I own / rent my home and have lived at this address for about 30 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8-29-22

Signed: [Signature]

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Gore Ashton, and I live at 2 Mission St Saugus
approximately 1 miles from the Wheelabrator Saugus waste-to-energy facility.
I own rent my home and have lived at this address for about 15 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/22/22

Signed: [Signature]

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Richard J. Liddle and I live at 326 Carr Rd. Saugus
approximately _____ miles from the Wheelabrator Saugus waste-to-energy facility. MA

I own rent my home and have lived at this address for about 20 years.

2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 5/22/22

Signed: [Signature]

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is LOU SPADACANT, and I live at 23 Mountain Ave
approximately 1 1/2 miles from the Wheelabrator Saugus waste-to-energy facility.
I own rent my home and have lived at this address for about 20 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/22/21

Signed: [Signature]

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Stephen Boyle and I live at 18 Seaside Way, Saugus
approximately _____ miles from the Wheelabrator Saugus waste-to-energy facility.
I own ~~rent~~ my home and have lived at this address for about 24 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 9/22/22

Signed: Stephen Boyle

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Robert F. Connors and I live at 151 Edmont Ave Saugus
approximately 1 miles from the Wheelabrator Saugus waste-to-energy facility.
I own rent my home and have lived at this address for about 17 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8-22-22

Signed: [Signature]

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Theresa Galloway, and I live at 27 Can Rd, Bly
approximately _____ miles from the Wheelabrator Saugus waste-to-energy facility.
I own (rent) my home and have lived at this address for about 2 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/22/22

Signed: Theresa Galloway

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is John Cooper, and I live at 44 Sawmills Lane
approximately 1/2 miles from the Wheelabrator Saugus waste-to-energy facility.

I own rent my home and have lived at this address for about 18 years.

2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/22/22

Signed: John Cooper

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Doug Clark, and I live at 19
approximately 1/2 miles from the Wheelabrator Saugus waste-to-energy facility.
I own rent my home and have lived at this address for about years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/23/22

Signed: Doug Clark

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Maria M. Vaz and I live at 12 Shaw Hwy. Saugus
approximately _____ miles from the Wheelabrator Saugus waste-to-energy facility.

I own / rent my home and have lived at this address for about 56 years.

2. I do not ever notice noxious odors at my home.

3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.

4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.

5. I do not think odors, dust or ash have affected my property value.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/22/22

Signed: [Signature]

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Kathy Woulson and I live at 39 New St.
approximately _____ miles from the Wheelabrator Saugus waste-to-energy facility.

I own / rent my home and have lived at this address for about 37 years.

2. I do not ever notice noxious odors at my home.

3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.

4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.

5. I do not think odors, dust or ash have affected my property value.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/12/22

Signed: Kathy Woulson

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Jeff Kaulin, and I live at 17 Williams St. Sps
approximately 1 miles from the Wheelabrator Saugus waste-to-energy facility.
I own rent my home and have lived at this address for about 11 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/22/22

Signed: Jeff Kaulin

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is CAIRO SORIANO, and I live at 38 School St Saugus
approximately 1 miles from the Wheelabrator Saugus waste-to-energy facility.

I own / rent my home and have lived at this address for about 8 years.

2. I do not ever notice noxious odors at my home.

3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.

4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.

5. I do not think odors, dust or ash have affected my property value.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/22/22

Signed: [Signature]

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Brenda Sweetland, and I live at 27 Corn Rd, Saugus
approximately 1/2 miles from the Wheelabrator Saugus waste-to-energy facility.
I own / rent my home and have lived at this address for about 43 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/22/22

Signed: Brenda Sweetland

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Elizabeth Marutka and I live at 34 Scotch St. Lynn
approximately _____ miles from the Wheelabrator Saugus waste-to-energy facility.

I own / rent my home and have lived at this address for about 20 years.

2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/22/22

Signed: Elizabeth Marutka

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Kristen Turner and I live at 4 Munroe St Saugus
approximately _____ miles from the Wheelabrator Saugus waste-to-energy facility.
I own ~~rent~~ my home and have lived at this address for about 23 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/22/22

Signed: [Signature]

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Stephanie Hernandez and I live at 4 Mon Rd Saugus
approximately 1 miles from the Wheelabrator Saugus waste-to-energy facility.

I own / rent my home and have lived at this address for about 8 years.

2. I do not ever notice noxious odors at my home.

3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.

4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.

5. I do not think odors, dust or ash have affected my property value.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/22/22

Signed: Stephanie Hernandez

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Charles G. Gifford, and I live at 7 W. Main Rd. Saugus
approximately 1/2 miles from the Wheelabrator Saugus waste-to-energy facility.
I own rent my home and have lived at this address for about 2 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/12/22

Signed: [Signature]

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

Exhibit 6

Different Name Copper/Cooper Declaration

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is John Copper and I live at 44 BRISTOW STREET
SAUGUS
approximately 1/2 miles from the Wheelabrator Saugus waste-to-energy facility.
I own / rent my home and have lived at this address for about 18 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on:

June 19, 2022

Signed:

[Signature]

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is John Cooper, and I live at 44 Sawmills Lane
approximately 1/2 miles from the Wheelabrator Saugus waste-to-energy facility.

I own rent my home and have lived at this address for about 18 years.

2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/22/22

Signed: John Cooper

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

Exhibit 7

Different Distance Fernandez Declaration

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Stephanie Fernandez, and I live at 4 milan Avenue, Saugus, ma 01906

approximately 3/4 miles from the Wheelabrator Saugus waste-to-energy facility.

I own / rent my home and have lived at this address for about 10 years.

2. I do not ever notice noxious odors at my home.

3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.

4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has affected my outdoor activities in any way.

5. I do not think odors, dust or ash have affected my property value.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on:

June 12, 2022

Signed:

Stephanie Fernandez

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Stephanie Hernandez and I live at 4 Mon Rd Saugus
approximately 1 miles from the Wheelabrator Saugus waste-to-energy facility.

I own / rent my home and have lived at this address for about 8 years.

2. I do not ever notice noxious odors at my home.

3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.

4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.

5. I do not think odors, dust or ash have affected my property value.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/22/22

Signed: Stephanie Hernandez

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

Exhibit 8

Different Duration Richard Nuzzo Declaration

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Richard Nuzzo, and I live at 12 Serina Way,
approximately 1 miles from the Wheelabrator Saugus waste-to-energy facility, Saugus, Ma.
I own / rent my home and have lived at this address for about 11 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on:

Richard Nuzzo

Signed:

June 20 2022

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Maria M. Vaz and I live at 12 Shaw Hwy. Saugus
approximately _____ miles from the Wheelabrator Saugus waste-to-energy facility.

I own / rent my home and have lived at this address for about 56 years.

2. I do not ever notice noxious odors at my home.

3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.

4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.

5. I do not think odors, dust or ash have affected my property value.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/22/22

Signed: [Signature]

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

Exhibit 9

Different Signature Serino Declaration

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is Cherie L. Snow, and I live at 38 Schenck St,
approximately 1 miles from the Wheelabrator Saugus waste-to-energy facility.
I own / rent my home and have lived at this address for about 8 years.
2. I do not ever notice noxious odors at my home.
3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.
4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.
5. I do not think odors, dust or ash have affected my property value.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 7/2/22

Signed: [Signature]

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRENDA SWEETLAND, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

WHEELABRATOR SAUGUS, INC.,

Defendant.

Civil Action No. 1:21-cv-10759-LTS

DECLARATION

Pursuant to 28 U.S.C. § 1746 I declare and say:

1. My name is CAIRO SORIANO, and I live at 38 School St Saugus
approximately 1 miles from the Wheelabrator Saugus waste-to-energy facility.

I own / rent my home and have lived at this address for about 8 years.

2. I do not ever notice noxious odors at my home.

3. I do not ever notice unusual or unnatural amounts of dust or ash on my property.

4. I enjoy numerous activities outside at my property, and neither odors, dust nor ash has
affected my outdoor activities in any way.

5. I do not think odors, dust or ash have affected my property value.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/22/22

Signed: [Signature]

I understand and agree that: (1) I am signing this voluntarily and I will not suffer any consequence if I decide not to sign it; (2) I have been informed that there is a proposed class action alleging that Wheelabrator has emitted noxious odors and dust and that I may be a member of the proposed class; (3) I am providing this to Wheelabrator and its attorneys who do not represent me and who may use it to defend against the proposed class action; and (4) before signing, I was informed that I have the right to contact plaintiff's counsel in the pending lawsuit, Liddle Sheets Coulson P.C.